

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
v. : Crim. No. 11-
BRIAN RAGAUCKAS : 18 U.S.C. § 1001(a)(2)
and § 2

I N F O R M A T I O N

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

False and Fraudulent Statements

1. At all times relevant to this Information:

(a) Defendant BRIAN RAGAUCKAS was a police officer with the Jersey City Police Department.

(b) Defendant BRIAN RAGAUCKAS and his wife were the owners of a home located in Secaucus, New Jersey (hereinafter "Secaucus property") which they had purchased on or about June 23, 2000.

(c) The Secaucus property was subject to a thirty-year mortgage in the amount of \$513,700 entered into between Hudson City Savings Bank and defendant BRIAN RAGAUCKAS and his wife on or about April 6, 2007.

(d) On or about March 25, 2008, defendant BRIAN RAGAUCKAS applied for a mortgage from Countrywide Bank FSB, located in Forest Hills, New York, in order to purchase a three-family home located in Jersey City, New Jersey (hereinafter "Jersey City" property).

(e) On or about September 23, 2008, defendant BRIAN RAGAUCKAS signed a Uniform Residential Loan Application (hereinafter "URLA") for the Jersey City property which 1) represented that he rented, rather than owned, the Secaucus property, 2) represented that he had not had an ownership interest in any property in the last three years, and 3) failed to acknowledge his outstanding mortgage liability for the Secaucus property although he was requested to list all liabilities, including real estate loans.

(g) On or about September 23, 2008, in order to induce the United States Department of Housing and Urban Development (hereinafter "HUD") to insure the Countrywide FSB mortgage for the Jersey City property, defendant BRIAN RAGAUCKAS signed a HUD/VA Addendum to Uniform Residential Loan Application (hereinafter "HUD Addendum") in which he falsely represented that the information contained in the URLA was true to the best of his knowledge and belief.

(f) Since at least as early as May 12, 2009, the thirty-year mortgage with Countrywide Bank FSB for the Jersey

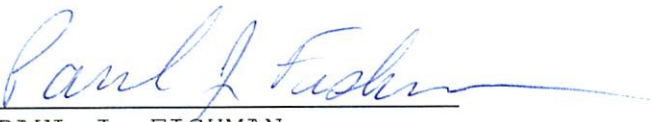
City property, which financial institution merged into Bank of America in April 2009, has been in default.

2. On or about September 23, 2008, in the County of Essex, in the District of New Jersey, and elsewhere, in a matter within the jurisdiction of HUD, being a department within the executive branch of the United States, defendant

BRIAN RAGAUCKAS

knowingly and willfully made and caused to be made false, fictitious, and fraudulent material statements and representations on the HUD Addendum, to wit: that the information contained in the URLA was true to the best of his knowledge and belief, when in fact, he owned the Secaucus property, he had purchased it within a three year time period prior to signing the URLA, and he had an outstanding mortgage on the Secaucus property.

In violation of Title 18, United States Code, Section 1001(a)(2) and Section 2.


PAUL J. FISHMAN
United States Attorney